



Public Policies

Published by the Missouri Department of Insurance

Vol. VI, No. 7

P.O. Box 690, Jefferson City, MO

April 2002

Through the roof:

Use of credit history raises premiums for unsuspecting consumers

Nancy T. Evans of Springfield recalls clearly when her financial history went sour. "My credit went down after I had the stroke," says the single mother of a teenage daughter. "Most of my bills were from the medical treatment," and, unable to work then, she couldn't afford to pay.

Evans did, however, keep her mortgage payments current, and they included her monthly share of taxes and insurance.

Now living on Social Security disability, Evans last year was stunned when her insurer almost doubled the monthly homeowners premium, upping it more than \$50 a month, because of her "credit score," based on her financial history. "I had been with them six years, and I had not filed a claim," she says.

Others were even more taken aback because they had no tarnishes on their credit histories, but faced steep premium increases.

Diane Epperson's 88-year-old mother in southwest Missouri "paid cash for everything, and she has never owned a credit card. She hasn't borrowed anything since she had her house paid for" long ago. Her mother lacked a credit history, so she had no credit score -- like about 10 percent or more of all Americans.

The insurer her mother had patronized for decades cited that lack of a score when it doubled her rates to more than \$600 a year, and she couldn't shop around for more affordable coverage.

"She had been covered under a sort of grandfather clause" that took into account the house's older wiring and use of fuses, Epperson said. "If we had looked for another insurer, she would have been forced to rewire the entire house."

Gov. Bob Holden and Missouri Department of

Insurance (MDI) Director Scott B. Lakin this year responded to growing complaints about the unfairness of credit scoring in homeowners and auto insurance by proposing new consumer protections, but face an uphill struggle against industry opposition.

Credit scoring converts personal financial histories into a single number that insurers consider a measure of a person's likelihood of filing claims. But this computer profiling downplays or eliminates the traditional evaluation of the individual's claims records and other risk factors like traffic tickets that insurers have used to decide whether to issue a policy and how much to charge.

Insurers say credit scoring provides an objective and administratively cheap way to reject risky owners and set rates for others. By last year, the use of credit scores spread to 92 percent of American auto and homeowners insurers.

But across the country, alleged abuses in credit



scoring practices have emerged as the top consumer issue of 2002, with legislative or administrative action expected in more than half the states.

Seniors like Diane Epperson's mother in the Ozarks often do not have enough installment debt to produce a credit score and are penalized with higher premiums. The same holds true for many farmers, Hispanics and Muslims -- or simply

Midwesterners with old-fashioned values about living within their means.

Equally compelling are the stories of persons
(See *credit history*, p. 2)

credit history

(continued from page 1)

facing huge, unexpected medical bills like Evans or other personal catastrophes like unexpected job layoffs or company closings that caused financial difficulties.

Agents, who must deal personally with these cases, have been leaders of the movement to restrict the use of credit scoring nationally and to expand consumer protections against abuses.

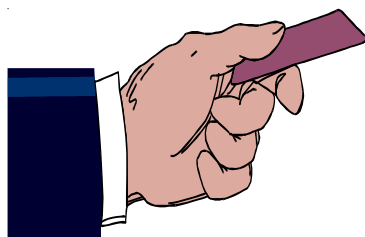
A Missouri House committee has endorsed minimal restrictions on the use of credit scoring to deny coverage if it is the "sole" reason. The core of the bill would have little effect because no auto insurer, for example, has yet filed plans to completely rely on credit scores in Missouri.

But under the bill, insurers still could use credit scores as the major reason for refusing to write new or renewed policies, and the committee's version leaves out all consumer protections against increasing rates – the most common complaint lodged with MDI about credit scoring.

The committee proposal closely resembles an insurance industry-backed proposal designed to derail state attempts nationwide to pass new laws restricting credit scoring. Industry lobbyists are fighting efforts to strengthen the legislation by saying consumers with "good" credit scores would lose "discounts" if the General Assembly limits the use of credit scores.

These so-called "discounts, however, often are misleading. One large insurer, for example, instituted "discounts" last year, based on credit scores, but only after increasing basic rates by more than 30 percent to offset lost income.

The House, for example, is expected to debate and decide whether to improve the committee proposal in early April. ♦



Lakin names first consumer panel for Department of Insurance

Council initially expected to address use of credit histories, health care costs, long-term care insurance

Director Scott B. Lakin has named 10 Missourians to the Department of Insurance's first consumer advisory council.

"I want to make sure that Missouri consumers have a key voice in state insurance policymaking because they are affected more than any other group," said Lakin, a former state lawmaker whom Gov. Bob Holden appointed to the Cabinet post earlier this year.

"The appointment of these 10 talented Missourians, with their diverse backgrounds, will help ensure that the interests of consumers are represented at the table when we make decisions on our legislative program, administrative rules, enforcement priorities and long-range plans. For me to make good decisions as Missouri's insurance director, I need to hear all points of view."

The consumer advisory council held its first meeting on Jan. 31 after the beginning of the new legislative session.

Lakin discussed with consumer advisory council members proposed legislation, on how credit histories are used in issuing or pricing insurance policies, medical privacy costs and better consumer protection for Missourians who buy long-term care insurance.

The Department of Insurance, with functions dating from 1869, became a Cabinet-level agency in 1991. The department, however, has never had a formal mechanism to allow consumers to affect policy.

Among the Missourians appointed by Director Lakin to the first MDI Consumer Advisory Council:

· Yvonne Sparks-Strauther, St. Louis, executive director of the Vashon/JeffVanderLou Initiative, who manages a \$5 million Danforth Foundation grant to help develop a 450-acre site near downtown St. Louis. She formerly headed Neighborhood Housing Services in St. Louis, which works to increase residential insurance coverage in urban core areas.

· Bill Anthony, a retired school administrator from Jefferson City. A past
(See *consumer panel*, p. 3)

consumer panel*(continued from page 2)*

spokesman for the Silver-Haired Legislature, Anthony has worked with the CLAIM program, a publicly funded senior health insurance counseling service. The federal Medicaid-Medicare agency recognized him last year for his assistance to beneficiaries.

- Kevin Hennosy, Kansas City, a writer, researcher and public advocate. Hennosy, former public affairs manager for the National Association of Insurance Commissioners, now is funded by that group to represent consumer interests. He also founded and heads Spread the Risk Inc., which provides research support to public officials, journalists and consumer groups on insurance public policy.

- Cheryl Gammon, Park Hills, a registered nurse who has worked in both urban and rural health-care settings over the past 30 years. She heads BJC Home Care, a subsidiary of the large St. Louis hospital system. Her work focuses on the health-care needs of some of Missouri's most economically depressed, outstate communities.

- Elizabeth Walser, Kansas City's public information coordinator. A former television reporter in Jefferson City, Springfield and Kansas City, Walser has produced the Behind the Badge and Kansas City Matters public affairs programs in Kansas City. She has been active in the Hispanic community and served on the advisory board for Breath of Life Foundation, a cystic fibrosis fundraising organization.

- Mary D'Agostino, Columbia, an accountant, former missionary and secretary to the Family Health Center board. D'Agostino became familiar with the demands of the state's health care and funding systems as the now-single mother of a special-needs child.

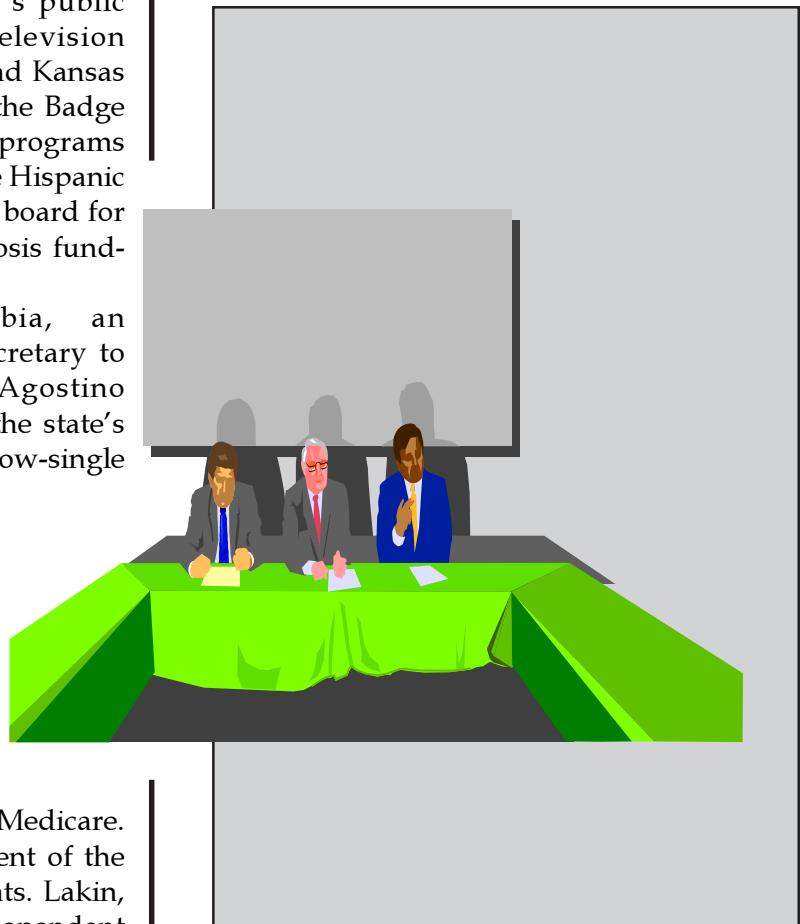
- Leslie Jordon, Hartsburg, a Missouri Women's Health Advisory Council member and former board member of Missouri Consumer Health WATCH. She has extensive experience in statewide programs serving developmentally disabled, mentally ill, elderly or addicted persons and funding sources such as Medicaid and Medicare.

- Jo Ann Evans, Carthage, president of the Missouri Association of Insurance Agents. Lakin, a former agent himself, noted that independent agents in particular often can identify consumer

insurance problems early and serve as effective advocates of their policyholders' interests. Evans, a certified insurance counselor, also belongs to the National Association of Health Underwriters.

- Elaine Diggs, St. Louis, a retired elementary school administrator. As a resident of the Penrose area, she has taken an extremely active role in Neighborhood Housing Services, serving as its community relations chairperson, newsletter editor and loan committee member.

- Les Wagner, Columbia, executive director of Boone County Group Homes and Family Support, a publicly supported residential program for developmentally disabled persons who often have physical health needs. Wagner has extensive personal and professional experience with managed-care health systems, and his wife is a social worker with cancer patients. ❖



MDI rejects plans to drop terrorist coverage for auto, home policies; accepts limited business exemptions

Insurers cannot sell workers compensation policies in Missouri that do not cover terrorism-related injury.

The Missouri Department of Insurance (MDI) is not allowing insurance company proposals to exclude terrorist-related damages from home, auto and other personal property coverage unless companies show such liability endangers their financial solvency, Director Scott B. Lakin said.

Lakin added that, until federal legislation is enacted to provide a “backstop” for insurers, MDI will accept company filings for most commercial policies – such as business owners’ liability – that have terrorism exclusions similar to those drafted by a national insurance organization.

But he said insurers cannot sell workers compensation policies in Missouri that do not cover terrorism-related injury and death of employees because state law does not permit that exclusion.

Lakin outlined the department’s position in a bulletin to all property and casualty insurers. MDI has not yet formally addressed life and health insurance and terrorism coverage, but Lakin said he did not expect MDI’s final position to differ from standards for auto and homeowners plans.

“Certainly, the world has changed since Sept. 11, particularly in the ability of primary insurance carriers to buy reinsurance to cover their catastrophic losses and protect their solvency,” Lakin said.

“But we have to add common sense to the equation and weigh the needs of Missouri businesses and residents. Particularly in the case of auto, home and health lines, it is very difficult to assert that insurers now face such an unpredictable and potentially expensive loss from terrorism that they can drop such coverage from policies and leave Missourians totally unprotected.”

Lakin and his staff are working closely with the National Association of Insurance Commissioners (NAIC) – a Kansas City-based group of all state and territorial insurance directors – to redefine what insurers must cover after Sept. 11. Most policies before provided coverage for terrorist damage, but companies

began filing exclusions across the country after the attack on the World Trade Center.

Business policies will still cover smaller terrorist events under MDI rules

NAIC members negotiated with the New York-based Insurance Services Office (ISO), which submits policy forms and rates on behalf of insurers to the states, to reach common ground on commercial terrorism exclusions. Generally speaking, under the ISO language, damage from most terrorist events is covered unless it exceeds \$25 million.

Lakin said MDI, which has limited legal ability to regulate commercial insurance, will accept the ISO language or provisions that are more advantageous to business policyholders. But the agency will begin administrative proceedings against any insurers that attempt to exclude terrorism damage altogether or restrict benefits more than the ISO standard.

An exception to the rule comes in workers compensation, which covers employees’ injury and death unless the state law specifically excludes the cause. Terrorism-related injury and death are covered. Three insurers, all part of one holding company, have withdrawn from the Missouri market because they could not find reinsurance for their workers compensation business that covered terrorism. On auto and home plans, insurers need to show they couldn’t pay claims.

For an insurer to exclude terrorism from its auto, home and other personal property lines of

*(See **terrorist coverage**, p. 5)*



terrorist coverage

(continued from page 4)

coverage, MDI will require the company to show that it cannot acquire reinsurance and it consequently risks insolvency if it covers terrorist damage.

Virtually all insurance companies purchase reinsurance to protect their finances against catastrophic events. Insolvency means the insurer lacks the financial ability to pay claims.

To date, when asked to provide proof of their inability to buy such coverage, insurers have been unable or chose not to submit such evidence.

So far, MDI has received terrorism exclusion filings on 47 homeowners and related policies, for example, but 35 have been withdrawn; MDI has notified the remainder about the need to withdraw. Twelve insurers, all in one insurance group, filed terrorist exclusions on private passenger auto policies, but they also have been withdrawn.

On property and casualty insurance, Missouri is known as a "use and file" state – companies can begin using rates and most policy forms and later file the information with MDI. If the agency objects to provisions, it must hold hearings at which the insurer defends its proposal.

On the health insurance side, one HMO has asked for a terrorism exclusion on its policies along with a handful of group life and health companies. The NAIC's position would deny such exclusions except in unique circumstances. Life and health insurers cannot use terrorist exclusions unless MDI approves them or does not act on the filings.

MDI still hopes Congress will provide relief on business terrorist coverage

In Washington, Congress has failed to approve safety net legislation for commercial terrorism coverage although the insurance, real estate and lending industries, many general business groups, the NAIC and the Bush administration have each endorsed specific plans or general guidelines on how to structure and fund continued terrorism coverage for businesses.

"I am hopeful that Congress and the president will eventually act at the federal level," Lakin said. "We need to make sure that business and workers' jobs are not threatened by uncovered losses from possible future terrorism." ❖

Regulatory Actions –

November, December
& January 2001

Legal Action – Agents, Agencies and Brokers

The Bar Plan Title Insurance Co., St. Louis, MO, \$5,518 forfeiture for allowing an unlicensed agent to write business.

Dominion Title and Escrow Services LLC, Cape Girardeau, MO, \$5,975 forfeiture for failure to maintain books and records, rebating, no license, employing unlicensed individuals and "good funds" violations.

Phoenix Title Inc., St. Charles, MO, \$175 forfeiture for employing unlicensed individuals.

Alan B. Cole, Hannibal, MO, license renewal denied because of other state's action.

Richard D. Haberstroh, Jr., St. Louis, MO, \$200 forfeiture for demonstrating lack of fitness or trustworthiness.

Ronald W. Shepard, Kansas City, MO, license denied for failure to respond.

Lecil W. Tennison, St. Charles, MO, license revoked for failure to respond.

Yen N. Vrentas, Independence, MO, license revoked for failure to respond.

Natalie L. Wade, Wentzville, MO, \$275 forfeiture for no license.

Richard H. Walsh, Shawnee, KS, \$600 forfeiture for unfair trade practice – defamation.

Calvin Webb, Kansas City, MO, license renewal denied for failure to respond, demonstrating lack of fitness and trustworthiness and misappropriation of funds.

(See *Regulatory Actions*, p. 7)

Public Policies

published by

Missouri Department of Insurance
301 W. High St. - P.O. Box 690
Jefferson City, MO 65102-0690

Gov. Bob Holden

Director: Scott B. Lakin

Editor: Randy McConnell

Associate Editor: Melissa Becker

Public Policies serves as a key communications link between MDI and Missouri's legislators, weekly and broadcast media, industry observers and trade associations.

Comments or questions, call 526-2946.

Lakin selects 8 insurance managers, agents to initial MDI industry advisory panel

Director expects group to improve understanding of how to streamline regulation while preserving consumer protection

Missouri Department of Insurance Director Scott B. Lakin has named eight insurance company executives and agents to the state agency's first Industry Advisory Council.

While the insurance industry already has numerous permanent representatives and part-time lobbyists stationed in Jefferson City, "we hope this group will help improve the department's communication with the day-to-day managers of the state's largest insurers," Lakin said.

"With better communication to the hands-on managers, we believe the department can improve the insurance market for consumers and companies alike. As a department, we want to understand more fully how we can streamline government regulation without jeopardizing consumer protections."

The industry council will complement the department's first consumer advisory council, which Lakin appointed earlier.

Lakin said his initial appointees represent companies with among the largest market shares in Missouri for property and casualty, accident and health, HMO and workers compensation lines. The agents include an agency owner from greater St. Louis with a high-volume property and casualty business, another from Kansas City focusing on life and health coverage and a third from rural Missouri offering full lines.

Lakin noted the industry has been changing rapidly as federal law and modern marketing have blurred the traditional lines that once separated insurance, securities and financial institutions. Across the nation, insurance regulators have been trying to increase the speed and ease with which insurers can begin marketing new products while maintaining the strong protections for consumers.

Named to the new MDI Industry Advisory Council were:

· Frank DiTirro, M.D., chief medical officer and senior vice president of Blue Cross and Blue Shield of Kansas City. DiTirro oversees medical

claims review for the insurer, which with its subsidiaries has major shares of Missouri's group, individual and HMO markets.

· Roy Goldman, Chesterfield, vice president and chief financial officer of Mercy Health Plans, an HMO that operates in three states and has significant shares of the St. Louis and Springfield markets. Goldman, an actuary, has his doctorate in mathematics from Rutgers.

· Barry Kelly, Columbia, general manager of Missouri Employers General Agency, a subsidiary of Missouri Employers Mutual Insurance Co., the state's largest workers compensation insurer. Kelly has more than 22 years of experience in agency operations, underwriting, account management, third-party administration and marketing.

· Gary D. Myers, Columbia, vice president of administration, Shelter Insurance Cos. A certified property and casualty underwriter, Myers oversees business planning, agency performance improvement, ceded reinsurance programs and the company's own insurance and risk management programs. He formerly worked for Employers Reinsurance Corp.

· Marilyn Schweitzer, Kansas City, owner of Schweitzer & Associates, an insurance agency. A 20-year veteran of the industry, Schweitzer helps individuals and groups with health, life and disability insurance, retirement plans and mutual funds. Past president of the Northland Chamber of Commerce, Schweitzer now heads Soroptomist International of Kansas City Northland.

· Brent Speight, Montgomery City, owner of Scott Insurance Agency. Speight's agency serves five rural counties from locations in Montgomery City, Warrenton and Mexico. Speight, who has worked in the industry 24 years, also has served as president of the Montgomery City Chamber of Commerce.

· Troy Turner, Columbia, head of Missouri auto claims and underwriting operations for State Farm Insurance. A certified property and casualty underwriter, Turner is a member of the Columbia Community Development Commission. A Brigham Young University

(See advisory panel, p. 7)

Regulatory Actions

(continued from page 5)

The following forfeited \$100 each for failure to respond to consumer complaints or late/incomplete response:

American Ambassador Casualty Co., Itaska, IL.
Atlanta Life Insurance Co., Atlanta, GA.
Camerson Mutual Insurance Co., Cameron, MO.
Employers Mutual Casualty Co., Kansas City, MO.
Founders Insurance Co., Des Plaines, IL.
Gateway Insurance Co., St. Louis, MO.
Healthnet, Inc., Kansas City, MO.
Iguarantee Trust Life Insurance Co., Glenview, IL.
Interstate Indemnity Co., Chicago, IL.
Jefferson Pilot Financial Insurance Co., Concord, NH.
Group Health Plan, Earth City, MO – 2 violations.
Mutual of Omaha Insurance Co., Omaha, NE.
Safeco Insurance Co. of America, Sunset Hills, MO – 2 violations.
Statewide Insurance Co., Waukegan, IL.
Travelers Casualty and Surety Co., Hartford, CT.
United Healthcare Insurance Co., Hartford, CT.
Universal Life Insurance Co., Memphis, TN.

November Company Changes

CGU Insurance Co., Boston, MA, changed its name to *OneBeacon Insurance Co.*
CGU Insurance Co. of New Jersey, Boston, MA, changed its name to *The Camden Fire Insurance Association*.
Commercial Union Insurance Co., Boston, MA, changed its name to *OneBeacon America Insurance Co.*
Dakota Truck Underwriters, Sioux Falls, SD, was admitted with liability authority.
Eden Park Insurance Co., Cincinnati, OH, changed its name to *Great American Protection Insurance Co.*
ExLSERVICE.COM (I) Pvt. Ltd., New Delhi, IN, was admitted as a third-party administrator (TPA).
General Accident Insurance Co., Boston, MA, changed its name to *Pennsylvania General Insurance Co.*
Great Lakes Life & Health Insurance Co., Lansing, MI, changed its name to *Renaissance Life & Health Insurance Co.*
Great Pacific Insurance Co., Santa Ana, CA, changed its name to *First American Property & Casualty Insurance Co.*

advisory panel

(continued from page 6)

graduate, he is pursuing a graduate degree in public affairs from the University of Missouri-Columbia.

Mollie Wells, Maryland Heights, owner of Wells Insurance Group. For a dozen years, Wells served as president of Gundaker Insurance Agency in St. Louis before buying the operation. An agent for 13 years, Wells has been a certified insurance counselor since 1991. ❖

Grejon Inc., St. Louis, MO, was admitted as a prepaid dental company.

Healthcare Underwriters Insurance Co., New York, NY, changed its name to *Medical Liability Mutual Insurance Co.*

IGF Insurance Co., Des Moines, IA, certificate of authority was suspended.

Safety First Insurance Co., Chicago, IL, was admitted with liability authority.

Southern-Owners Insurance Co., Lansing, MI, was admitted with property, liability, fidelity, surety and miscellaneous authority.

Specialty Surplus Insurance Co., Long Grove, IL, redomesticated from New Jersey to Illinois.

November 2001 Financial Exams

Healthcare USA of MO LLC, St. Louis, MO.

Missouri Physicians Assoc., St. Louis, MO.

December Company Changes

AAOMS National Insurance Co. RRG, changed its name to *OMS National Insurance Co. RRG*.

American Spirit Insurance Co., Cincinnati, OH, changed its name to *Great American Spirit Insurance Co.*

Associated Physicians Insurance Co., Chicago, IL, certificate of authority was suspended.

Avesis Third Party Administrators Inc., Phoenix, AZ, was admitted as a third-party administrator (TPA).

Bankers United Life Assurance Co., Cedar Rapids, IA, merged with *Life Investors Insurance Co. of America*.

Camelot Insurance Underwriters, St. Louis, MO, merged with *Gateway Insurance Co.*

Eagle American Insurance Co., Cincinnati, OH, changed its name to *Great American Security Insurance Co.*

Employers Insurance of Wausau a Mutual Co., Wausau, WI, changed its name to *Employers Insurance of Wausau*.

Gab Robins Risk Management Services, Inc., Parsippany, NJ, was admitted as a TPA.

Humana Insurance Co., Green Bay, WI, merged with *Employers Health Insurance Co.*

Imperial General Life Insurance Co., Phoenix AZ, merged with *American Founders Life Insurance Co.*

Innovative Resource Group, LLC, Waukesha, WI, was admitted as a TPA.

Jamestown Fire Insurance Co., California, MO, merged with *Highland Mutual Insurance Co.*

Newport Mutual Insurance Co. Inc. RRG, Laguna Hills, CA, registered as a risk retention group.

PHC Physician Networks, Inc., Atlanta, GA, certificate of authority as a TPA was suspended.

PHICO Insurance Co., Mechanicsburg, PA, certificate of authority was suspended.

Kaiser Foundation Healthplan of KC Inc., Overland Park, KS, surrendered its certificate of authority.

SafeGuard Health Plans, Kansas City, MO, merged with *Dental Source of Missouri and Kansas Inc.*

Sterling Administrative Services Inc., Philadelphia, PA, certificate of authority as a TPA was suspended.

The Copenhagen Reinsurance Co. Ltd., Lyngby, Denmark, withdrew from NAIC listing of alien insurers.

USA Services Group, Inc., Ft. Lauderdale, FL, certificate of authority as a TPA was suspended.

(See *Regulatory Actions*, p. 8)

Regulatory Actions

(continued from page 7)

Wasatch Crest Casualty Insurance Co., Salt Lake City, UT, merged with **Wasatch Crest Insurance Co.**

Wellmark Administrators, Inc., Des Moines, IA, changed its name to **First Administrators Inc.**

Western Indemnity Insurance Co., Rock Hill, NY, was removed as a qualified reinsurer in Missouri.

December 2001 Financial Exams

GMAC Insurance Co. Online, Inc., Hazelwood, MO.

Humana Insurance Co., Louisville, KY.

Humana Kansas City, Inc., Louisville, KY.

Instant Auto Insurance Co., Irving, TX.

Interlex Insurance Co., Springfield, MO.

Intermed Insurance Co., Springfield, MO.

National General Assurance, Hazelwood, MO.

Travelers Protective Association of America, St. Louis, MO.

January Company Changes

American Continental Life Insurance Co., Chicago, IL, changed its name to **CAN Group Life Assurance Co.**

American Republic Insurance Co., Des Moines, IA, assumed the credit insurance obligations of **Consumers Life Insurance Co.**

Avesis Inc., Owings, Mills, Maryland, withdrew as a TPA.

CompBenefits Insurance Co., Roswell, CA, assumed certain group dental insurance contracts.

Combined Insurance Co. of America, Chicago, IL, assumed some of the insurance coverage issued by **Reliance Insurance Co.**

Delta Dental Plan of Wisconsin Inc., Stevens Point, WI, withdrew as a TPA.

Eagle Insurance Co., Bethpage, NY, was removed from the approved eligible surplus line carriers.

EOS Claims Services Inc., Rancho, Cordova, CA was admitted as a TPA.

Equitable Plan Services, Inc., Oklahoma City, OK, withdrew as a TPA.

Health Partners of the Midwest, Clayton, MO, surrendered its TPA certificate of authority.

HealthNet Inc., Kansas City, MO, changed its name to **Mid America Health Care Plans, Inc.**

Innovative Resource Group Inc., Waukesha, WI, withdrew as a TPA.

Life Reassurance Corp. of America, Stamford, CT, changed its name to **Swiss Re Life & Health America Inc.**

Lutheran Brotherhood, Appleton, WI, merged with **Aid Association for Lutherans.**

Manning & Smith Insurance, Wichita, KS, withdrew as a TPA.

Metropolitan Fire Protection District Health and Welfare Fund, Inc., St. Louis, MO, was admitted as a assessable political subdivision.

Northfield Insurance Co., Mendota Heights, MN, redomesticated from Missouri to Iowa.

State National Specialty Insurance Co., Fort Worth, TX, redomesticated from Florida to Texas.

The Manufacturers Life Insurance Co. of North America, Bloomfield Hill, MI, merged with **Manufacturers Life Insurance Co. (USA).**

Risk Capital Reinsurance, Greenwich, CT, changed its name to **Arch Reinsurance Co.**

January 2002 Financial Exams

AGC Life Insurance Co., Nashville, TX.

Group Health Plan, Inc., Earth City, MO.

National General Insurance Co., Hazelwood, MO.

Missouri Department of Insurance

P.O. Box 690

Jefferson City, MO 65102-0690